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May 27, 2021

The Honorable Anne E. Thompson
USDC, District of New Jersey (Trenton)
Clarkson S. Fisher Federal Bldg & U
Trenton, NJ 08608

RE: Failla v. George's Foods, LLC, et al.
Docket No. 3:20-cv-07109-BRM-TJB
File No. 666.47134

Dear Judge Thompson:

Pursuant to the court's direction, please accept this as a joint report of the parties as to the status of this matter.

The parties have completed much of the necessary discovery in this matter. This includes all written discovery, depositions of party representatives and the deposition of one non-party witness.

There are some discovery items that remain to be completed, although the parties do not, at this point, consider these items as critical to commencing settlement discussions. These items include the depositions of plaintiff's supervisor and/or manager, possibly deposing the investigating police (after we receive the complete report), and expert discovery.

Plaintiff's counsel advises that he expects to receive a report from a life care planner in the next 30 days. At that point,

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he expects to be able to make a settlement demand. At that point, I will discuss our position further with my client and determine whether we are prepared to engage in negotiations or if we wish to obtain responsive experts before doing so.

We believe that a further status report and/or status conference in July would be productive.

Please do not hesitate to let us know if there any additional questions or concerns.

Respectfully,

Paul Daly

PD:ld

cc: David T. Sirotkin, Esq.
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